UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF OHIO EASTERN DIVISION

| IN RE: |) | CASE NO. 12-19038 |
|----------------|---|--------------------------------|
| |) | |
| WILFRED CANNON |) | CHAPTER 13 PROCEEDINGS |
| |) | |
| |) | JUDGE ARTHUR I. HARRIS |
| Debtor(s) |) | |
| |) | |
| |) | OBJECTION TO MOTION FOR RELIEF |
| |) | FROM STAY AND ABANDONMENT |
| |) | (DEUTSCHE BANK NATIONAL TRUST |
| |) | <u>COMPANY)</u> |

Now comes Wilfred Cannon, Debtor, and hereby objects to the Motion for Relief from Stay and Abandonment filed on behalf of Deutsche Bank National Trust Company and, as grounds therefore, states that the Debtor has made each and every payment to the mortgage company since the commencement of this case. The mortgage company has accepted and cashed each and every payment from the Debtor. Furthermore, the Debtor was offered a loan modification, which he accepted. His ex-wife could not sign the modification because there was a restraining order against her and she was not permitted anywhere near the premises or anywhere near the Debtor.

WHEREFORE, the Debtor prays that this Court enter an denying the Motion for Relief

from Stay and Abandonment filed on behalf of Deutsche Bank National Trust Company.

Respectfully submitted,
/s/Lee R. Kravitz
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CERTIFICATE OF SERVICE

I certify that on October 8, 2018, a true and correct copy of Debtor's Objection was served:

Via the Court's Electronic Case Filing System on these entities and individuals who are listed on the Court's Electronic Mail Notice List:

Lauren A. Helbling, Trustee Office of the Chapter 13 Trustee 200 Public Square, Ste. 3860 Cleveland, OH 44114 (via ECF)

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/s/Lee R. Kravitz
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